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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

WARREN GARDNER, et al., on Behalf of
Themselves and All Others Similarly
Situated,

Plaintiffs,

v.

STARKIST CO., a Delaware Corporation,
and DONGWON INDUSTRIES CO. LTD.,
a South Korea corporation,

Defendants.

Case No.: 19-cv-02561-WHO

JOINT STATUS REPORT

Date: June 1, 2021
Time: 2:00 p.m.
Place: Ctrm. 2, 17th Floor
SAC filed: December 23, 2019

Hon. William H. Orrick

JOINT STATUS REPORT

Plaintiffs Warren Gardner, Lori Myers, Angela Cosgrove, Autumn Hessong, Robert McQuade, Colleen McQuade, James Borruso, Fidel Jamelo, Jocelyn Jamelo, Anthony Luciano, Lori Luciano, Robert Nugent, Avraham Isac Zelig, Ken Petrovcik, Megan Kiihne, Kathleen Miller, Tara Trojano, Jason Petrin, Amy Taylor, Heather Meyers, and Rachel Pedraza (collectively, "Plaintiffs") and Defendant StarKist Co. ("StarKist" and collectively with Plaintiffs, the "Parties"), hereby submit this Joint Status Report.

The Parties are actively engaged in discovery. Plaintiffs have propounded interrogatories, requests for admission, and requests for production on StarKist. StarKist has responded to most of Plaintiffs' written discovery and on April 12, 2021 and May 17, 2021, StarKist produced documents in response to Plaintiffs' requests. Plaintiffs are currently in the process of reviewing those documents. Plaintiffs served a Notice of Rule 30(b)(6) Deposition of StarKist Co. on April 16, 2021. After conferring on the initial agreed-upon topics, the Parties have agreed that the first corporate representative will be deposed on June 2, 2021. Plaintiffs intend to take the depositions of StarKist's percipient witness(es) which will be identified as discovery proceeds. Plaintiffs have also issued numerous third-party subpoenas to various entities for the production of documents.

StarKist propounded written discovery requests to Plaintiffs on May 7, 2021, which Plaintiffs are currently responding to. StarKist also intends to take the depositions of the 21 named plaintiffs and of any other fact witnesses who may be revealed in the course of discovery.

The Parties continue to be open to exploring private, non-binding mediation or settlement discussions by October 29, 2021, before the Court rules on a motion for class certification. Currently, the Parties are working to identify an agreed-upon private mediator.

Based on the current status of the case and that the Parties do not believe there are any issues that require the Court's attention at this time, the Parties request that the Case Management Conference currently scheduled in this matter for June 1, 2021 at 2:00 p.m. be vacated.

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Dated: May 21, 2021

BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.

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Dated: May 21, 2021

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LOCAL RULE 5-1(i)(3) ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing of this Joint Status Report, and have authorized the filing of this Joint Status Report.

Dated: May 21, 2021

By: s/Patricia N. Syverson
Patricia N. Syverson

CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail notice list, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice list.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 21, 2021.

/s/ Patricia N. Syverson
Patricia N. Syverson